

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 3:23-cv-00243
)	
SOUTHERN BAPTIST CONVENTION;)	Judge Campbell
GUIDEPOST SOLUTIONS LLC; and)	Magistrate Judge Frensley
EXECUTIVE COMMITTEE OF THE)	Jury Demand
SOUTHERN BAPTIST CONVENTION,)	
)	
Defendants.)	

MOTION FOR LEAVE TO FILE SUPPLEMENTAL RESPONSE

Plaintiff Johnny M. Hunt, by and through the undersigned counsel, respectfully submits this Motion for Leave to File Supplemental Response in relation to the Motion for a Protective Order and *In Camera* Review (ECF Doc. No. 61) filed by Guidepost Solutions LLC (“Guidepost”).

As grounds for the instant motion, Plaintiff would show that, since the filing of his Response to Guidepost’s Motion for a Protective Order and *In Camera* Review on October 27, 2023 (ECF Doc. No. 68), and the completion of briefing in relation to Guidepost’s Motion for a Protective Order and *In Camera* Review, Plaintiff obtained a copy of an article published in the Houston Chronicle that concerns materials which are the subject of Guidepost’s Motion for a Protective Order and *In Camera* Review. A copy of the referenced article published in the Houston Chronicle is included with the instant motion. (Ex. 1).

The Houston Chronicle article states that the complainant and her husband shared the husband’s “private” journal with a reporter as part of giving an interview in May 2022. The

published article even purports to quote from the husband's journal. This is further evidence that the journal and related material shared with Guidepost are highly relevant to the accusations against Hunt, that the complainant and her husband have been willing to share such information with third parties, and that there is no legal basis to exempt these materials from discovery in this action.

For the foregoing reasons, Plaintiff respectfully requests leave to file a Supplemental Response to Guidepost's Motion for a Protective Order and *In Camera* Review.

Dated: November 17, 2023

Respectfully submitted,

s/ Andrew Goldstein

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Leave to File Supplemental Response has been served on November 17, 2023, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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